

Proposed Rathkeale Local Area Plan 2023 – 2029

Environmental Reports

June 2022



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

Contents

1.0 Introduction	1
2.0 Screening Statement.....	1
3.0 Stage One - Pre-Screening	2
4.0 Stage Two - Environmental Significance Screening	3
5.0 Appropriate Assessment Screening	7
5.1 Screening Matrix	8
5.2 Finding of No Significant Effects Matrix.....	13
6.0 Stage 1 Flood Risk Assessment	14
6.1 Introduction.....	14
6.2 Resources informing the Stage 1 Flood Risk Identification	14
6.3 Stage 1 Flood Risk Identification	15
6.4 Strategic Flood Risk Assessment and Strategic Environmental Assessment	18
6.5 Justification Test for former Mart Site	18
6.6 Conclusion	20

1.0 Introduction

This Strategic Environmental Assessment (SEA) Screening accompanies the Proposed Rathkeale Local Area Plan (LAP) 2023 – 2029, in accordance with the SEA Directive (2001/42/EC). The SEA screening assessment is a formal, systematic evaluation of the likely significant environmental effects of implementing a plan, policy or programme and any amendments to same. The Proposed Rathkeale LAP, once adopted by the Elected Members of the Adare – Rathkeale Municipal District will replace the existing Rathkeale Local Area Plan 2012 – 2018 (as extended). The Council is statutorily required to review the existing Rathkeale LAP at this time to ensure the policies and objectives align with current regional planning policy and higher level plans, in particular the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region and the Proposed Limerick Development Plan 2022 – 2028.

Rathkeale is located 31km south west of Limerick City, and south of the N21 National Road. It is a Level 3 settlement as identified in the Draft Limerick Development Plan 2022 – 2028. Refer to Figure 1 below.

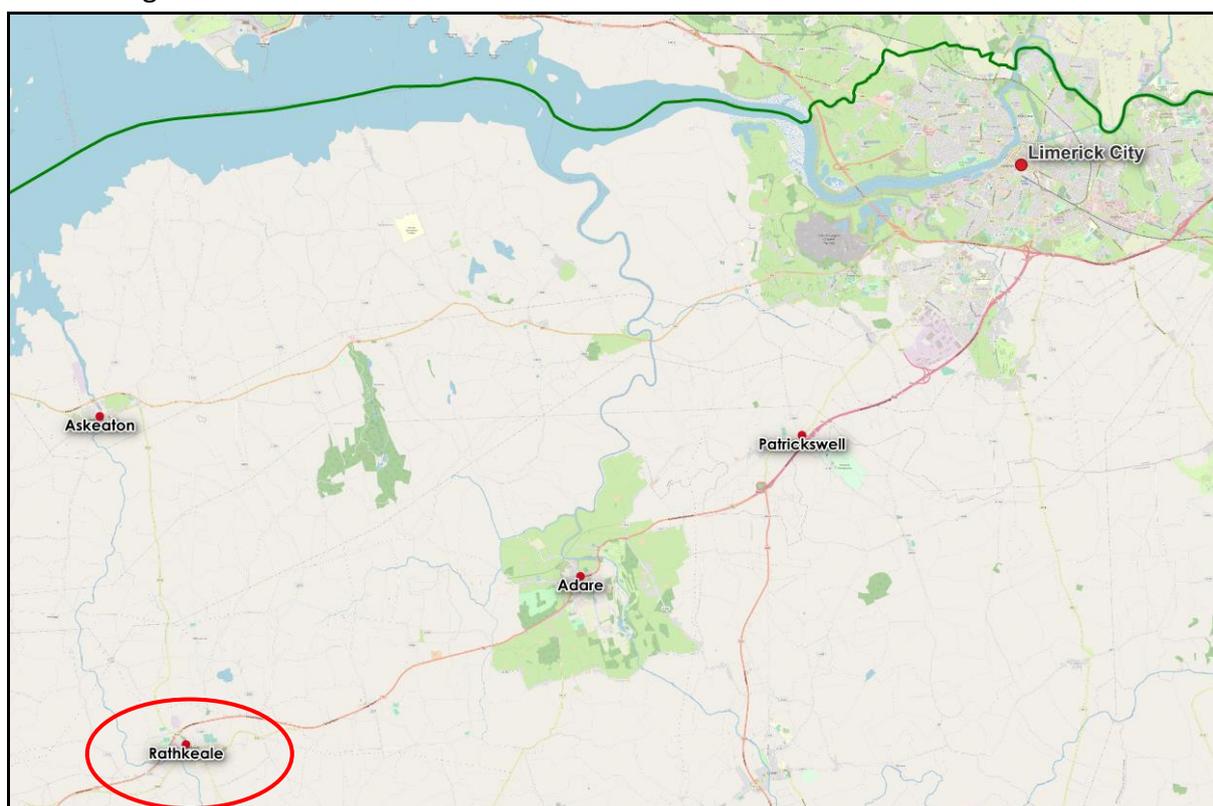


Figure 1: Location of Rathkeale in Limerick

2.0 Screening Statement

The Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 (S.I. No. 436 of 2004, SI 201 of 2011) requires a case by- case screening of individual plans and programmes based on the criteria in Schedule 2A to the Planning and

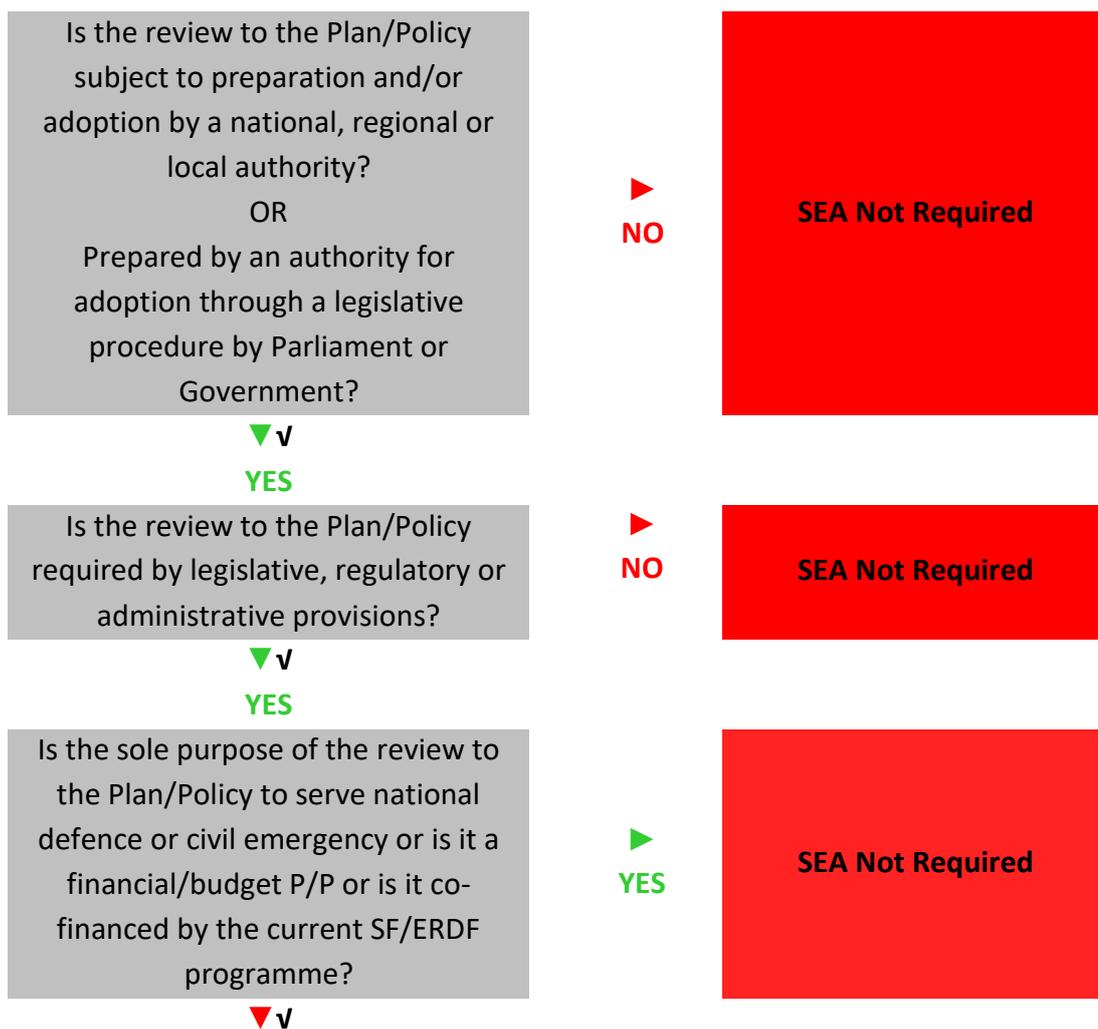
Development Regulations 2001 (as amended). These criteria must be taken into account in determining whether or not significant effects on the environment would be likely to arise.

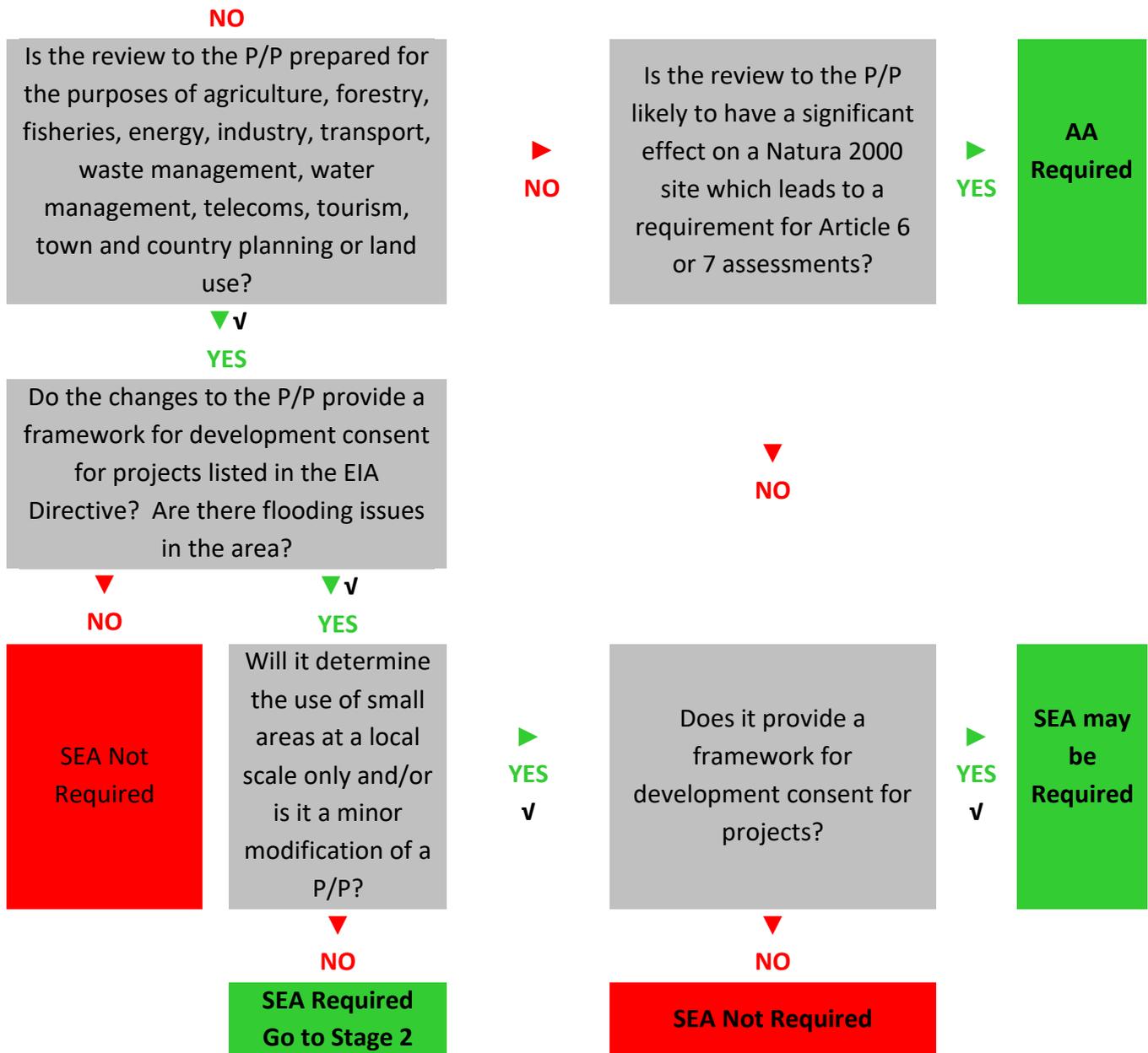
The population of Rathkeale was 1,494 according to the 2006 Census and in 2016 the Census population of the town was 1,441. The population growth target for the town identified in the Limerick Development Plan is an additional 403 persons by 2028 (resulting in an estimated total population of 1,844 within the lifetime of the plan) as established by the Core Strategy. The existing zoned area of the Rathkeale LAP 2012 - 2018 (as extended) is 2.93km² (293 hectares) and this reduced to 2.33 km² or 233.6 hectares in the proposed plan. The projected population figures and zoned area figures are below the thresholds for statutory SEA, which are 5,000 people and 50 km² respectively.

3.0 Stage One - Pre-Screening

The first step in determining whether the preparation of the Proposed Rathkeale Local Area Plan would require an SEA involves a pre-screening check as outlined in Figure 2 below.

Figure 2 Pre-Screening Decision Tree





4.0 Stage Two - Environmental Significance Screening

The application of environmental significance criteria is important in determining whether an SEA is required for Local Area Plan/Policies or modifications or reviews of Plans/Policies. Annex II (2) of Directive 2001/42/EC sets out the “statutory” criteria that should be addressed when undertaking this stage.

Table 1 – Criteria for developing the likely significant of the environmental effects and the characteristics of the Proposed LAP addressing same

<p>1</p>	<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</p> <p>The Local Area Plan guides development within the settlement boundary of Rathkeale as outlined in the Proposed Land Use Zoning identified in the proposed plan. It achieves this, through zoning and the application of updated planning policies which have come about as result of the adoption of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region (RSES). These updated policies place stronger emphasis on centralised, sequential development around the town centre, compact growth, achieving high quality living environments in towns and villages. A new approach at this local area plan level is the inclusion of an assessment of the suitability of lands for development considering the availability of services such as water services, transport links and amenities. This ensures that the land use zoning of the Proposed LAP is based on availability of services, as determined by the Settlement Capacity Audit which identifies the availability of infrastructure necessary for future development and supports the centralised approach to zoning.</p>
<p>2</p>	<p>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</p> <p>The review of the existing Local Area Plan is set within the context of the National Planning Framework, the Regional Economic and Spatial Strategy for the Southern Region and the Proposed Limerick Development Plan 2022-2028. These higher level spatial plans inform the policies and objectives of the Proposed Rathkeale LAP. These policy documents have replaced the Limerick County Development Plan 2010-16 (as extended), the Mid West Regional Planning Guidelines 2010 and National Spatial Strategy. The Proposed Limerick Development Plan is anticipated to be formally adopted in 2022.</p>
<p>3</p>	<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;</p> <p>The review of the Rathkeale LAP 2012 – 2018 (as extended) is undertaken in accordance with the Planning and Development Act 2000 (as amended), and takes into account the need to incorporate policies and objectives of the Proposed Limerick Development Plan and its Core Strategy. The Core Strategy <i>“must integrate relevant EU directive related considerations that development plans must comply with”</i>, amongst them the SEA Directive, Water Framework Directive and the Habitats Directive.</p> <p>The adoption of the National Planning Framework and the Regional Spatial and Economic Strategy also contain updated policy content in relation to compact growth, climate change and achieving better environmental solutions.</p>

4	Environmental problems relevant to the plan or programme;
	The capacity of the Waste Water Treatment Plant in Rathkeale is 4,000 population equivalent and the plant is currently treating the loadings received (Annual Environmental Report Rathkeale 2020 Irish Water). There is sufficient capacity within the plant to cater for the projected population targets in the plan. The report also concludes that the WWTP has no observable impact on water quality.
5	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
	<p>The Proposed LAP is prepared to align with the significant changes in the higher-level spatial plans referred to above. The Proposed Rathkeale LAP places greater emphasis on climate change, environmental solutions and consolidation of growth within the town centre. The National Climate Action Plan 2021 is the latest in a series of guidance and legislation provides a detailed plan to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.</p> <p>The LAP will comply with all relevant climate legislation, guidance and targets that will emerge over the lifetime of the plan. Chapter 12 in Section 12.2 deals with climate action, both mitigation and adaptation. Other sections such as those dealing with transport promote modal shift.</p>

Table 2 Characteristics of the Effects and of the Area Likely to be affected

1	Probability, duration, frequency and reversibility of the effects
	<p>The effects are likely to be located within the plan area. Ex-situ effects are most likely through pollution from the Waste Water Treatment Plant (WWTP). However, as indicated above the WWTP has sufficient capacity for any proposed population increase and the 2020 Irish Water Report on this WWTP indicated that its operation did not have an effect on local water quality.</p> <p>Where development takes place within the plan area these effects are likely to be irreversible if green field sites are developed. However, the emphasis on development following the contents of both the National Planning Framework and the Regional Spatial and Economic Strategy are likely to emphasise sequential development outwards from the town centre, Infill/brown field development and re-use of under-used/vacant sites and buildings minimises the overall effects in the plan area. The emphasis on coordinated development through assessment of properly serviced lands has already been mentioned in item 1, Table 1 above.</p>
2	Cumulative nature of the effects
	Cumulative negative environmental effects are likely to be localised within the plan boundary. As noted above, it is likely that land use zoning has been further rationalised in the Proposed LAP which will reduce the overall magnitude of effects as the proposed

zoning of the Plan complies with the Core Strategy population projections of the proposed Limerick

Development Plan, and the current emphasis for higher-level spatial plans on the principle of compact development. Refer to Map 1 Land use Zoning, Appendix 1.

3 Trans-boundary nature of the effects

There are no trans-boundary effects anticipated.

4 Risks to human health or the environment (e.g. due to accidents)

None anticipated. There are no Seveso sites within the plan boundary. In relation to water supply a 2018 Drinking Water Audit found high turbidity in some water sources in October 2018. (EPA Drinking water Audit Report 18/10/2018). Upgrade works have been recommended and carried out since that event. Night time restrictions on water supply have been put in place in the recent past and seasonal difficulties in the supply of water have been noted particularly at Christmas time. These have implications for the supply of basic necessities in the town and are a constraint on the town’s development.

5 Magnitude and spatial extent of the affects (geographical area and size of the population likely to be affected)

The area that will be affected is within the development boundary of Rathkeale. Refer to Map 1 Land Use Zoning, Appendix 1, which shows a reduction to 2.33 km² in the zoned land from the area of the existing plan which is 2.93 km² in the Rathkeale Local Area Plan 2012 – 2018 (as extended). The 2016 Census population of Rathkeale was 1441. The population target for the plan area by 2028 is 1,884. Both of these figures are below the mandatory SEA threshold.

6 Value and vulnerability of the area likely to be affected due to:

- Special natural characteristics or cultural heritage;

The land surrounding the River Deel and its tributary to the east have been zoned for Agricultural or Open Space and Recreation purposes in the Proposed LAP. These areas, particularly the land parcel to the south east of the plan area function as flood plains and any development on these areas may impair this function.

In terms of cultural heritage, Rathkeale is classified as an historic town (L1029-031001) in the record of monuments and places. There is an additional ten historic monuments located in the town as well as a three monuments whose exact location has been lost. The Council has a policies and objectives on archaeological monitoring on development locations where they might have an impact on archaeological sites. Potential archaeological impacts can also be dealt with at development management stage. During the plan preparation process changes to the zoning, polies and objectives of the Proposed LAP will be monitored for possible effects on archaeology.

Maintaining the Architectural Conservation Area designation, and the Record of Protected Structures will assist in protecting the historical built heritage of the town.

	<p>- Exceeding environmental quality standards or limit values;</p> <p>It is not expected that any environmental quality standards will be exceeded or that the value of vulnerable areas limited as a result of the review. The likely reduction in the amount of land zoned for development use reduces the likelihood of any standards being breached.</p>
7	<p>-Intensive land-use;</p> <p>As outlined above with the reduction in zoning the intensity of potential land use within the plan boundary is reduced. When coupled with the Service Capacity Audit referred above it is likely that effects of intensive land use would be reduced by the proposed LAP as any development would occur on adequately serviced sites.</p>
8	<p>Effects on areas or landscapes which have a recognised national, Community or international protection status.</p> <p>No effects anticipated, none located within the development boundaries of the Proposed Plan area. The importance of the town centre in particular have been recognised in the plan and is cross referenced across the proposed Plan, as the prioritised location for further development sequentially outwards from the settlement core also known as the town centre.</p>

Stage Two – Summary, Conclusions and Recommendations

At this stage in the process, no significant environmental impacts can be identified in relation to the above issues.

Following the screening process, whereby the specific context of the review of the Rathkeale Local Area Plan has been assessed against the environmental significance criteria as contained in Annex II (2) of the SEA Directive, **it is concluded that a Strategic Environmental Assessment is not required for the Proposed Rathkeale Local Area Plan 2023 – 2029 at this stage in the plan making process.**

5.0 Appropriate Assessment Screening

This is an Appropriate Assessment Screening of the proposed Rathkeale Local Area Plan 2023 -2029, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC).

The Council is legally required to update its planning policies and objectives for the Proposed Rathkeale Local Area Plan to align with higher level spatial plans, the NPF, RSES and the Proposed Limerick Development Plan. The Proposed Rathkeale Local Area Plan will replace the Rathkeale Local Area Plan 2012-2018 (as extended) and will contains policies and objectives that are informed by new national and regional planning policy.

The Rathkeale LAP 2012 – 2018 (as extended) is nearing the end of its statutory time period. The adoption of the proposed Limerick Development Plan 2022 – 2028, will also require that lower tier plan are updated to comply with the Development Plan. The Proposed LAP is required to be screened for Appropriate Assessment. Based on the *Methodological Guidance on the Provision of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, a ‘Screening Matrix’ and a ‘Finding of No Significant Effects Matrix’ have been completed. The conclusion is that the Proposed Rathkeale Local Area Plan 2023 - 2029 **does not require** an Appropriate Assessment.

The principal consideration for an Appropriate Assessment would be if the LAP were likely to have significant effects on a Natura 2000 site – Special Areas of Conservation and Special Protection Areas (SACs and SPAs). There is no SAC or SPA located within the boundary of the Proposed Rathkeale LAP. The LAP has been drawn up to ensure that land uses, developments and effects arising from developments based upon this Proposed Plan (either individually or in combination with other plans or projects) will not give rise to significant adverse impacts on the integrity of any Natura sites, regard to their conservation objectives.

1. **Changes to the plan:** as outlined above in the SEA screening, there has been substantial changes to plan policies to reflect current higher-level spatial plan policies and objectives. The National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region, and the Proposed Limerick Development Plan (2022-2028) emphasise the principles of compact growth, active travel and climate action, prioritising the development of infill/brownfield sites, re-use of under-use/vacant site and buildings, and sequential development to the town centre. The Proposed LAP applies this principle to the local level in Rathkeale. Similarly, the Proposed LAP has updated policies on ecological issues and climate change to reflect national policy.

The conclusion is at this stage of the plan making process for the Rathkeale Local Area Plan 2023 – 2029, is that it **does not require** the preparation of a Natura impact statement or any progress beyond the screening stage of the appropriate assessment process.

5.1 Screening Matrix

Table 3 – Screening Matrix

Brief description of the project or plan:
The proposed Rathkeale Local Area Plan 2023 – 2029 replaces the existing Rathkeale LAP 2012-2018 (as extended) The proposed LAP aligns policies and objectives with those of higher level spatial plans and Government Guidance and legislation published since 2012 with particular emphasis on sustainable mobility, active life styles and climate action, town centre first approach, compact growth, natural and built heritage and obligations

under EU legislation and environmental issues.

Brief description of the Natura 2000 sites:

There are no Natura sites within the town. The Lower River Shannon SAC (002165) site is approximately 13 km to the north west of the town. This site has been selected because of a range of riparian Habitats and species such as wet woodlands, tidal mudflats, estuaries and for species such as otter, salmon and lamprey. Maintenance of high water quality is an important factor in ensuring the preservation of these Habitats.

The Askeaton Fen Complex (SAC site 002279) is 3.5km to the north of the town, while the Curraghchase Woodlands (00174) lies 6.5km to the north east. The fen complex is a series of low lying fens and wetland complexes in the midst of intensive agricultural land. Curraghchase Woodlands consist of both woodlands with mixed chiefly planted species and the remains of Curraghchase House, which is a roost for the Lesser Horseshoe Bat.

Due to distance and lack of pathways it is not considered that there will be effects on any Natura 2000 sites in Limerick.

Describe the individual elements of the plan (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site:

The main way in which ex-situ impacts could be created is through pollution that would affect water quality downstream in the Lower River Shannon SAC site or abstraction, which could threaten the Askeaton fen sites which are closer. Details outlined above demonstrate adequate capacity in the treatment plant to cater for the projected growth.

The water supply from Rathkeale comes from bore holes in Kilcolman 8km to the south of Rathkeale. To date no effects on the fen have been identified from this source.

A policy ensuring that development takes place only in line with the provision of appropriate infrastructure is included in the Proposed Plan, as a means of safeguarding sensitive landscapes in proximity to Rathkeale. Objective KI02 ensures that future development complies with the requirements of Irish Water and that there is adequate waste water to cater for existing and proposed development.

Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site by virtue of:

Size and scale;

There are no designated sites within the town boundary. Ex-situ impacts are taken into account by including policies that ensure that development takes place in tandem with the establishment of appropriate facilities such as wastewater infrastructure- see SEA screening.

Land-take;

There is no land zoned within any Natura 2000 site, within Rathkeale. Consolidation of the land zoned on the principles of compact settlement, and serviceable lands, the zoning

the LAP boundary and would be sufficiently distant from the designated sites so as to ensure that there will be no effect on any designated site.

Transportation requirements;

It is not envisaged that any of the transport policies put forward in the plan will have any effect in terms of encroachment on any designated sites.

Duration of construction, operation, decommissioning, etc;

No construction projects within the plan area will encroach upon designated sites.

Other

None.

Describe any likely changes to the site arising as a result of :

Reduction of habitat area:

None anticipated, no Natura 2000 sites exist within the town boundary.

Disturbance to key species;

No projects giving rise to disturbance to key species for Natura 2000 sites is likely within the boundary of the Proposed Plan as no such sites are present in the plan boundary. The inclusion of policies and objectives ensure that development takes place only in line with provision of wastewater treatment systems which, helps to ensure that no ex-situ effects through water pollution issues are reduced. See Chapter 11 Environment, Heritage and Blue Green infrastructure.

Habitat or species fragmentation

The absence of designated sites and the presumption in the Proposed Plan against development that would cause ex-situ effects will help to prevent ex-situ effects. The appropriate zoning of land, including Agriculture and Open Space and Recreation will help prevent fragmentation of non-designated Habitats within the plan area and reduce disturbance for the species that are contained within them.

Reduction in species density

There are no Natura 2000 sites close to or within the Proposed Plan area. It is not envisaged that any reductions in non-designated species density would take place through the fact that that rezoning of residential lands has occurred. In the Proposed Limerick Development Plan, the emphasis placed on the nature conservation and ecological assessment and this is reflected in the Proposed LAP. Chapter 11 Environment, Heritage and Blue Green Infrastructure emphasises the protection of Natura 2000 sites and also non designated Habitats and landscape features in the plan area.

Changes in key indicators of conservation value

No projects giving rise to significant adverse changes in key indicators of conservation value for Natura 2000 sites are likely given that policies are in place to control possible ex-situ effects and the absence of Natura sites within the plan boundary. The reduction in the area zoned for residential in the current plan and its re-zoning as agricultural/open space lessen development pressure in the plan area, prevents overloading of existing infrastructure and by allowing a buffer around the rivers and tributaries in the Proposed

Plan area reduces the chances of ex-situ effects on the Lower River Shannon Site in particular.

Climate Change

The consolidation of development within the boundary of the Proposed LAP while at the same time recognising the importance of the conservation sites outside the plan boundary is not expected to result in climate change issues that would affect the sites. The Climate Action Plan 2021 provides a detailed plan to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

The Proposed LAP has sections specifically devoted to climate action and will comply with legislation, guidance and targets that will emerge over the lifetime of the plan.

Describe any likely impacts on the Natura 2000 site as a whole in terms of:

Interference with the key relationships that define the structure of the site

None anticipated as there are no Natura 2000 sites within the Proposed Plan area or close to it. See emphasis regarding development of sewage facilities in line with development to reduce chances of ex-situ effects.

Interference with key relationships that define the function of the site

With the consolidation of development by the updating of the plan and the overall conservation objectives set out in the Proposed Local Area Plan and by the Draft Limerick Development Plan, it is not expected that the various factors that help designated sites function as particular Habitats will be affected.

Provide indicators of significance as a result of the identification of effects set out above in terms of:

- **Loss** - Not applicable.
- **Fragmentation** - Not applicable.
- **Disruption** - Not applicable.
- **Disturbance** - Not applicable.
- **Change to key elements of the site (e.g. water quality etc)-**

The Askeaton fen complex site synopsis identifies the main risk as being localised drainage. This is outside the control of the LAP and given the distance of the LAP area from the fen any works within its boundary are unlikely to have an effect.

Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts are not known.

Not applicable.

5.2 Finding of No Significant Effects Matrix

Table 4 - No Significant Effects Matriix

Name of Project or Plan:	Proposed Rathkeale LAP 2023 – 2029
Name and location of Natura 2000 sites:	Lower River Shannon SAC (Site Code 002165) 13 km to the northwest. Askeaton Fen Complex (Site Code 002279) SAC site 3.5km to the north. Curraghchase Woodlands (Site Code 00174) 6.5km to the north east.
Description of the Project or Plan	As given in Screening Matrix above.
Is the Project or Plan directly connected with or necessary to the management of the site (provide details)?	No
Are there other projects or plans that together with the project of plan being assessed could affect the site (provide details)?	The Proposed LAP has been written to ensure that the uses, developments and effects arising from proposals and/or permissions based upon the policies and objectives of the Plan (either individually or in combination with other plans or projects) will not give rise to significant adverse impacts on the integrity of Natura 2000 sites, having regard to their conservation objectives.
Assessment of Significance of Effects	
Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites:	The review of the Rathkeale LAP includes polices relating to sewage infrastructure that minimises pollution risk to the sites and is not likely to affect the designated sites.
Explain why these effects are not considered significant:	No sites exist within the plan boundaries and policies, including those set out in the Proposed Limerick Development Plan for the prevention of pollution, nuisance or other environmental effects likely to significantly and adversely affect the integrity of the Natura 2000 sites.
List of Agencies Consulted: Provide contact name and telephone or email address:	AA Screening Reports were sent to: <ul style="list-style-type: none"> • Department of Housing, Local Government and Heritage. • EPA • Department of Environment, Climate and Communications. • Department of Agriculture, Food and the

	Marine.		
Response to consultation	Reponses received during initial consultation		
Data Collected to Carry out the Assessment			
Who carried out the Assessment?	Sources of Data	Level of assessment Completed	Where can the full results of the assessment be accessed and viewed
Heritage Officer, Forward Planning, Economic Development and Enterprise Directorate, Limerick City and County Council.	Existing NPWS Site Synopsis Site visits during plan preparation process.	Desktop study, site visits	On display with plan.

6.0 Stage 1 Flood Risk Assessment

6.1 Introduction

This is the Stage 1 Flood Risk Identification Assessment of the Proposed Rathkeale Local Area Plan (LAP) 2023 – 2029 is prepared in accordance with the Planning System and Flood Risk Management, DEHLG and OPW, 2009, heretofore referred to as the Flood Guidelines. The Assessment should be read in conjunction with the attached Map 1 Land Use Zoning and the Map 2 Predicative Flood Risk of the Proposed LAP. The Assessment identifies whether there may be any flooding issues in the Proposed LAP area /sites that may warrant further investigation at the planning application level.

6.2 Resources informing the Stage 1 Flood Risk Identification

As per the Technical Appendices of the Flood Guidelines the following sources of information inform this assessment:

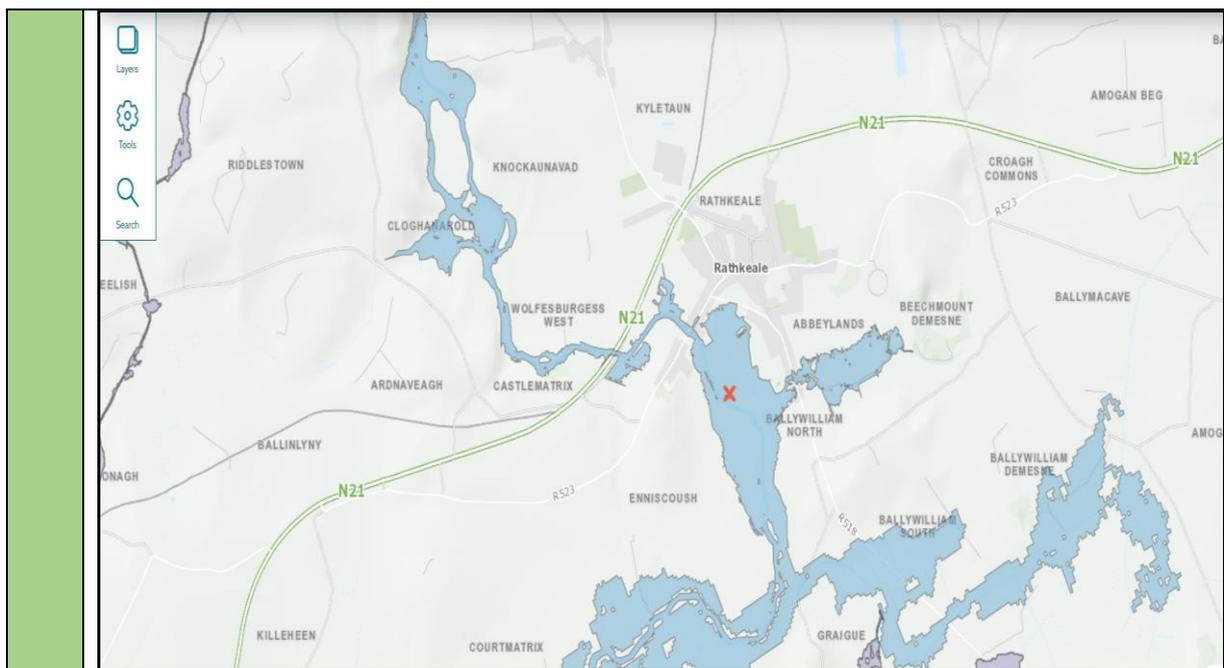
1. OPW Preliminary Flood Risk Assessment Indicative Fluvial Flood Maps;
2. National Coastal Protection Strategy -flood and coastal erosion risk map:
3. Predictive, Historic Flood and Benefiting Land maps;
4. Predictive flood maps - CFRAM studies;
5. River Basin Management Plan and reports;
6. Indicative assessment of existing flood risk under Preliminary Flood Risk Assessment;
7. Previous flood risk assessments supplementing planning applications;

8. Advice from Office of Public Works;
9. Internal consultation with Local Authority personnel - the CFRAM Capital Projects and Adare Rathkeale Municipal District Office;
10. Topographical maps - in particular LIDAR;
11. Information on flood defence condition and performance;
12. Alluvial deposition Maps;
13. Liable to flood markings on historic 6-inch maps;
14. Local Libraries and newspaper reports;
15. Local consultation e.g. voluntary groups, local community;
16. Walkover surveys to assess potential sources of flooding and likely routes of flood waters and flood defences;
17. National, regional and local spatial plans and previous planning applications.

Other resources to inform the assessment include the Draft Limerick Development Plan 2022 – 2028, Flooding Guidelines Circular PL 2/2014, national flood hazard mapping on floodinfo.ie, predicted changes in flood events resulting from climate change and the River Shannon Catchment Flood Risk and Management Plan, and JBA studies on behalf of the Council in Limerick.

6.3 Stage 1 Flood Risk Identification

No.	Flood Risk Identification
1	OPW Preliminary Flood Risk Assessment Indicative Fluvial Flood Maps
	These maps show the south-east of the town to be at flood risk. These lands are zoned for agriculture and open space.
2	National Coastal Protection Strategy -flood and coastal erosion risk map
	Maps for this study would not be of any assistance in dealing with specific flooding issues in Rathkeale as the risk in Rathkeale is identified as fluvial.
3	Predictive, Historic Flood, and Benefiting Land Maps
	These maps were consulted and areas that are more likely to flood were identifiable. Benefiting lands i.e. lands that would benefit from drainage works, can be co-related to river flood plains. These showed patterns along the river to the south west of the town and to the south-east. This land has been zoned as agricultural/open space in the Proposed LAP.
4	CFRAM Predictive flood maps



The CFRAM Maps show flood risk in areas outside the town and concentrated along the Deel River. In many cases these areas are now zoned for open space and water compatible uses.

5	River Basin Management Plan
	Insufficient detail available to inform responses at LAP level
6	Indicative assessment of existing flood risk under Preliminary Flood Risk Assessment
	Existing areas of flood risk as indicated above are the areas along the river and in the north western portion of the plan area and south-eastern portion of the plan along the river. De-zoning has taken place in these locations.
7	Previous Flood Risk Assessments (FRA) to supplement planning applications
	A FRA was submitted with planning ref 08/348 and is considered in this Stage 1 assessment. These lands were re-zoned to the agricultural and open space and recreation in the 2012 LAP and continue to do so the Proposed LAP.
8	Advice from Office of Public Works
	Consultation with the OPW to date has informed the Proposed LAP.
9	Local Authority personnel, in particular the CFRAM Capital Projects and Adare Rathkeale Municipal District Office
	Discussions regarding drainage and flooding issues took place with Council engineers, which indicated the sensitivity of the area along the river.
10	Topographical maps - in particular LIDAR
	LIDAR mapping is available and this has been used by JBA to update information flooding in Limerick.
11	Information on flood defence condition

	No flood defences exist within the plan area at this time. Rathkeale is identified for investment to development flood protected and the OPW are currently considering option to address flooding in Rathkeale, in the interim period, the precautionary approach has been taken to flooding.
12	Alluvial deposition maps
	Alluvial soils are those deposited by rivers and the extent indicates historic flood events. These allied to benefiting areas in addition to historic maps (first and later editions of the 6- inch maps) show areas prone to flooding. The soils maps show alluvial soils in a corridor of varying width on either sides of the river as it runs through the plan area. This corridor varies in width from 50 to 400m.
13	Liable to flood markings on historic 6 inch maps
	These historic maps, particularly the first edition, contain information on landscape features and infrastructure such as mills and weirs that can indicate hydrological impacts. Areas liable to flood are shown on the older first edition 6-inch maps and the editions revised between 1920 and 1924. The area shown as being prone to flooding is in the area currently zoned as open space close to the town centre. Other areas shown as prone to flooding in the western part of the town and in the south-east have been zoned agricultural.
14	Local Libraries and newspaper reports
	Flooding reports from the OPW website were consulted in the preparation of this assessment, these related to flood events close to the Deel Bridge dating from the late 1960s. Local anecdotal knowledge concurs with this event.
15	Local Consultation
	First Issues consultation stage undertaken 5 th November 2021 – 20 th December 2021 with the Issues Paper on public display locally as part of the statutory LAP preparation process.
16	Walkover Survey by Council Staff
	A walk over survey indicates the extent of vegetation associated with wetter ground conditions such as yellow flag iris, <i>juncus</i> spp. and creeping buttercup. Surveys also gave indications of surface ponding of water. The preliminary walkover indicates the sensitivity of the area along the river generally corresponding to the alluvial soil maps referred to above, particularly in the south western portion of the town which has been re-zoned as agricultural land. Part of this area has vegetation which indicates poor drainage.
17	Higher Level Spatial Plans
	The Proposed LAP has been informed by the policies and objectives of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the

6.4 Strategic Flood Risk Assessment and Strategic Environmental Assessment

As per Section 4.2 of the Flood Guidelines this Assessment has been carried out in a manner that is integrated with the SEA process. Any subsequent stages of flood risk assessment will be integrated with the SEA process as the Proposed LAP progresses through to final adoption. Similarly, corresponding SEA Screening Reports will consider the environmental effects of the Proposed LAP against environmental criteria for the plan area, including mitigation measures and future monitoring of effects including flooding.

6.5 Justification Test for former Mart Site

As per Section 4.2 of Flood Guidelines, A Flood Justification Test has been undertaken for lands known as the former Mart Site. These lands have been identified as liable to flooding given the most up to date OPW flooding maps available, under the CFRAM programme and the Stage 1 Assessment above. These lands are zoned Town Centre in the Proposed LAP. Currently, the lands are under-used with a vacant/derelict structure on site. The location of the site is on the R518 at New Line and Main Street Rathkeale.

1	The urban settlements for growth under the National Planning Framework, Regional Economic and Spatial Strategy, statutory plans under the Planning and Development Act 2000 as amended, relevant Directives and the Planning Guidelines.	
	<p>Rathkeale is a Level 3 Settlement in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. The site is located adjacent to Main Street and has potential to support a broad range of employment, retail, community, residential and transport functions for the existing town centre.</p>	
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of	This brown-fill site is ideally located in the town centre and is of sufficient scale to offer

	<p>opportunities, for connectivity between Main Street and community facilities at New Line, including public library, school and creche. It satisfies national planning policy in terms of compact growth, the re-development of vacant, under-used lands and applying the sequential approach to development by prioritising the development of lands adjacent to the town centre, in this case Main Street in Rathkeale. Appropriate development of these lands supports the envisaged population growth of Rathkeale as per the Core Strategy and higher-level spatial plans within the lifetime of the Proposed LAP.</p>
<p>(ii) Comprises significant previously developed and/or under-utilised lands</p>	<p>Former Mart Site in Rathkeale Town.</p>
<p>(iii) Is within or adjoining the core of an established or designated urban settlement</p>	<p>The lands are zoned town centre and located immediately adjoining the core of the town.</p>
<p>(iv) Will be essential in achieving compact or sustainable urban growth</p>	<p>The redevelopment on these lands will contribute to compact urban growth aligned to higher-level spatial policy.</p>
<p>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement</p>	<p>Lands are located on Main Street is the central and historic core of Rathkeale. The lands will assist in consolidation of the core of the town, provide connectivity within the town and support sustainable means of movement.</p>
<p>3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the local area plan preparation process, which demonstrates that flood risk to the development can be</p>	<p>Part of these lands are subject to flooding as indicated in the map above. The Planning Authority will require applications on these lands to be supported by a comprehensive flood risk assessment as per Flood Guidelines. The Council continue to collaborate with the OPW regarding flood risk in Rathkeale.</p>

adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	
4 Conclusion of the Justification Test	
Given the measures above, the objectives of the Proposed LAP, the Planning Authority is satisfied that the proposed zoning of these lands as town centre for development is appropriate subject to more detailed site-specific flood risk assessment to be submitted as supplementary information with planning applications on these lands.	

6.6 Conclusion

The precautionary approach has been taken to zoning of lands in Rathkeale, lands identifiable as at risk of flooding following the Stage 1 Flood Identification Assessment above have been zoned agricultural or open space and recreation and only less vulnerable uses will be open to consideration on these lands, save for the lands justified above, which will be subject to a robust flood risk assessment. Having regard to the approach taken and the objectives set out in the Proposed Local Area Plan, it is considered that the Stage 1 assessment has been carried out in accordance with the relevant standards.